

# **EXHIBIT G**

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**From:** Marriott, Michelle L. (SHB) [MLMARRIOTT@shb.com]  
**Sent:** Friday, December 23, 2011 9:30 AM  
**To:** Reckers, Robert H. (SHB); Hann, Bree  
**Cc:** Hixson, Thomas S.; Howard, Geoff; 'Kieran Ringgenberg'; Redmond, Megan J. (SHB); Buresh, Eric A. (SHB)  
**Subject:** RE: Oracle v. Rimini Street

Kieran and Bree,

As discussed during yesterday's meet-and-confer, here is a summary of Rimini Street's positions with respect to its Second and Third 30(b)(6) notices. As we stated, through our previous correspondence and our discussions yesterday, Rimini Street continues to evaluate its outstanding discovery requests in light of information provided by Oracle (some of which was continuing to be provided by Oracle just over the last two weeks). The proposals listed below are part of our continued effort to narrow the issues on which we still need discovery from Oracle, and we remain interested in obtaining that discovery in the most efficient manner.

We agree to withdraw 2<sup>nd</sup> Notice Topics 1-5, 19, 23, 27-28, 31, 34-38, 40, 41, 48-55, 59-60 and 3<sup>rd</sup> Notice Topics 3, 4, 6, 7, 8, 9, 15, 16, 18, 20, 21 and 22.

Topic 6: Please identify, for each copyright registration where the derivative box is checked, the work of which it is a derivative.

2<sup>nd</sup> Notice Topics 7-13, 16, 42-47, 57-58, and 3<sup>rd</sup> Notice Topics 11, 13: Oracle has not identified the legal theories on which it intends to rely at trial with respect to its copyright infringement, breach of contract, and inducement claims. Specifically, we are requesting an identification of (1) each Rimini Street action, (2) the contractual provision and/or copyright that Oracle contends was breached/infringed as a result of Rimini Street's action, and (3) whether Oracle will contend at trial that the action was copyright infringement, breach of contract, inducement, or some combination. If Oracle does not supplement these interrogatories, we will assume that the information provided in the interrogatories is the totality on which Oracle intends to rely at trial. We discussed a supplementation to the following interrogatories:

- Contract:
  - Rog 11:
  - Rog 32
- Copyright:
  - Rog 17
  - Rog 18
- Topic 45: Rog 36

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2<sup>nd</sup> Notice Topic 14: Provide testimony.

2<sup>nd</sup> Notice Topic 15: Oracle has stipulated that Rimini Street is a competitor.

2<sup>nd</sup> Notice Topic 17: Supplement Rog 25 or provide testimony.

2<sup>nd</sup> Notice Topic 18: Propose designating Catz Dep. 127:10-131:12 and Phillips Dep. 57:25-59:15 as 30(b)(6).

2<sup>nd</sup> Notice Topic 20: Our December 6 letter offered to stipulate that “Oracle is not, and has never been, willing to grant Rimini Street a license for its support of PeopleSoft, J.D. Edwards, Siebel, or Oracle software.” Alternatively, we propose designating Phillips Dep. 170:6-172:4 and Catz Dep. 164:19-170:3 as 30(b)(6).

2<sup>nd</sup> Notice Topic 21: Provide testimony.

2<sup>nd</sup> Notice Topic 22: Provide testimony.

2<sup>nd</sup> Notice Topic 24: Previously offered stipulations in our December 6 letter. Alternatively, we propose designating Phillips Dep. 170:6-172:4 and Catz Dep. 164:19-166:11 as 30(b)(6).

2<sup>nd</sup> Notice Topic 25: Previously offered stipulation. Alternatively we proposed designating Phillips Dep 170:15-23 and Catz Dep 166:6-11 as 30(b)(6).

2<sup>nd</sup> Notice Topics 26 and 30: We proposed that Oracle stipulate that Rimini Street’s conduct has not resulted in a lost opportunity for Oracle to license Oracle software, and that Oracle has received full payment under its own contracts with customers at issue. Absent that stipulation, these topics stand.

2<sup>nd</sup> Notice Topics 32-33: We propose designating Cummins Dep. 213:14-23 as 30(b)(6).

2<sup>nd</sup> Notice Topic 39: Update Rog 27, or provide testimony.

2<sup>nd</sup> Notice Topic 56: Update Rog 37, stipulate that Oracle does not receive any revenue off of its development databases, or provide testimony.

2<sup>nd</sup> Notice Topic 61: Provide testimony.

3<sup>rd</sup> Notice Topic 5: Update Rog 30, or provide testimony.

3<sup>rd</sup> Notice Topic 10/19: Provide testimony.

3<sup>rd</sup> Notice Topic 12: Update Rog 19, or provide testimony.

3<sup>rd</sup> Notice Topic 14: Update Rog 20, or provide testimony.

3<sup>rd</sup> Notice Topic 17: Rog 21 identifies some instances of alleged interference. Unless updated, we assume this is what Oracle intends to rely on at trial.

Thanks,  
Michelle

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**From:** Reckers, Robert H. (SHB)  
**Sent:** Wednesday, December 21, 2011 4:19 PM  
**To:** 'Hann, Bree'

**Cc:** 'Hixson, Thomas S.'; 'Howard, Geoff'; 'Kieran Ringgenberg'; Redmond, Megan J. (SHB); Marriott, Michelle L. (SHB); Buresh, Eric A. (SHB)  
**Subject:** RE: Oracle v. Rimini Street

Bree,

Sorry for the delay in getting back to you. We are available at 1pm Pacific (3 Central) tomorrow to confer regarding the deposition notices. Please let me know if that time still works for Oracle. We can use the below dial-in info:

(800) 394-7219 Passcode: 291622

Thanks, Rob

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**From:** Hann, Bree [mailto:bree.hann@bingham.com]  
**Sent:** Thursday, December 15, 2011 10:54 AM  
**To:** Reckers, Robert H. (SHB)  
**Cc:** Hixson, Thomas S.; Howard, Geoff; Kieran Ringgenberg  
**Subject:** FW: Oracle v. Rimini Street

Rob,

We are available to meet and confer regarding Rimini's 30(b)(6) notices on Wednesday, December 21, from 9-2:30 Pacific, or Thursday, December 22, from 12-4:30 Pacific. Please let me know what times work for you.

Thanks,  
Bree

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**From:** Glidewell, Jeff O. (SHB) [mailto:JGLIDEWELL@shb.com]  
**Sent:** Wednesday, December 14, 2011 8:15 AM  
**To:** Banks, Christopher (SHB); Buresh, Eric A. (SHB); Dykal, Ryan D. (SHB); Guglielmi, Celia (SHB); Hixson, Thomas S.; Marriott, Michelle L. (SHB); Niegowski, David J. (SHB); norton; Palumbo, Kristen A.; phan; Reckers, Robert H. (SHB); Redmond, Megan J. (SHB); ringgenberg; Tong, Jared M. (SHB)  
**Cc:** Broz, Rebecca J. (SHB)  
**Subject:** Oracle v. Rimini Street

Counsel:

Please find an attached letter from Mr. Reckers to Mr. Hixson regarding Rimini Street's Second 30(b)(6) Deposition Notice.

Thank you.



**Jeff Glidewell**  
*Intellectual Property Paralegal*  
2555 Grand Boulevard  
Kansas City, MO 64108  
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Mail Gate made the following annotations on Wed Dec 14 2011 10:15:21

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